

Legal References:

- [RCW 74.08A.260](#)
- [RCW 74.08A.275](#)
- [RCW 74.08A.285](#)
- [RCW 74.12.410](#)
- [WAC 388-61-001](#)
- [WAC 388-310-400](#)
- [WAC 388-310-700](#)
- [WAC 388-310-0200](#)
- [WAC 388-310-0700](#)
- [Public Law 104-193 Sec. 407](#)

Document issues, strengths and the person's plans on a consistent basis. As we get to know the person better, we can use new insights to create ever more effective IRPs.

Example:

Sandy is a 35-year-old single parent with 14 years of education and a spotty work history. When asked the CE substance abuse question, “Does alcohol or drug use by you or other family members make it hard for you to find or keep a job?” Sandy hesitated, and then answered, “Yes.” In response to the follow-up questions, Sandy acknowledged that she lost her last job due to absenteeism related to alcohol and might have a problem with alcohol. It is evident that Sandy is not in crisis and she is able to complete the rest of the comprehensive evaluation.

Once this information is entered into eJAS, the WFPS is prompted to refer Sandy for a substance abuse assessment. The WorkFirst Program Specialist (WFPS) then:

- Creates the referral (documented in eJAS),
- Arranges to complete the rest of the comprehensive evaluation and
- Develops an IRP.

All alcohol or drug use entries are entered in the Chemical Dependency category and considered special record.

WorkFirst HandBook

Tools

Comprehensive Evaluation and Comprehensive Evaluation Foundation

This section has two separate sub-sections:

- [Section 3.21](#)- *Comprehensive Evaluation* provides an overview of the entire comprehensive evaluation process for all WorkFirst partners.
- [Section 3.22](#)- *Comprehensive Evaluation Foundation* contains specific instruction for DSHS staff to complete the comprehensive evaluation foundation.

3.21 Comprehensive Evaluation (CE)

Everyone has skills and abilities needed in today's workforce. Weaving those skills and abilities with labor market realities and education levels is the cornerstone of the new comprehensive evaluation.

The primary objectives of the comprehensive evaluation are:

- Better information about parents' skills and abilities and quicker placement in employment pathway activities;
- More objective decision making based on clearer program criteria;
- Increased parent involvement in developing their plan for participation, resulting in more parent buy-in and better results; and
- More consistency in how the program operates across the state through stronger program standards.

The comprehensive evaluation is the key tool in leading parents directly to employment since job search continues to be the most appropriate pathway for the majority of parents. For other parents, the comprehensive evaluation leads to employment through training or Community Jobs. In some instances, parents receive services to help resolve issues while participating in work related activities.

What is a Comprehensive Evaluation?

The comprehensive evaluation is a series of evaluations designed to assist the WorkFirst partners and help TANF parents achieve better and quicker engagement in employment-related activities which lead to employment. Parents complete a multiple-part evaluation provided by the WorkFirst partners as quickly as possible after TANF approval and at key points while they are engaged in the WorkFirst program.

Who must receive a Comprehensive Evaluation?

Comprehensive evaluations are not done on a set schedule. Comprehensive evaluations are event-driven. The [Comprehensive Evaluation Events chart](#) gives detailed information about when a comprehensive evaluation is required.

Unless they meet the exceptions below, the following people must complete all or a portion of the comprehensive evaluation:

- Newly approved TANF applicants (including those who have returned to TANF after being off assistance for less than 6 months),
- Sanctioned parents,

- Parents who are leaving job search (whether they are referred back early or completed job search without finding a job),
- Parents who are not making progress or unable to continue with an assigned activity (unless it is possible to use an existing alternative plan in the most recent comprehensive evaluation),
- Parents entering the pregnancy to employment pathway, and
- Under some circumstances, parents who want to enroll in basic or vocational education or other types of training. (See [Combining Work & Training](#), and [Stand Alone, Full-Time Training Options](#) sections for more details.)

The exceptions to receiving a comprehensive evaluation are:

- LEP pathways parents, who will participate in an evaluation conducted by the service provider
- Minor parents
- Child only cases
- Parents determined to be exempt from WorkFirst participation for reasons defined in RCW. (However, the opportunity to complete the comprehensive evaluation will be offered and exempt parents will be referred if they choose to participate in the evaluation.)

Parents who require immediate services because of an urgent issue, such as family safety, will be directed to the social worker for assessment and services. See [“Criteria for Decision Making”](#). The parent will continue to complete the remainder of the comprehensive evaluation process as he or she is able.

When should the Comprehensive Evaluation be conducted?

The comprehensive evaluation should be conducted as quickly as possible after TANF eligibility has been determined or as part of a re-engagement process for a parent already in sanction. The foundation piece of the comprehensive evaluation is conducted by the WFPS in the CSO for the newly approved TANF application or shortly thereafter. Then parents are referred to the other portions of the CE via an initial IRP, and the expectation is that the entire CE will be completed within 10 business days. The WFPS sets an appointment date for completion of the employment pathways IRP for as soon after the 10 business days as possible.

Parents who have an immediate and urgent need identified at the time of the foundation evaluation will be referred to a Social Worker for an assessment and services. In addition, parents who are pregnant or for whom a social services assessment is appropriate will be referred to the social worker as part of the CE. When this is the case, the time spent in CE will likely exceed the 10 business days, and is the exception to the rule. However, parents should be directed to complete the other portions of the CE as soon as they are able.

Parents are referred to the CE each time they are approved for TANF, including returners (those who are coming back to TANF within six months of exiting.) The expert partner agency will determine, based on previous CE information and the circumstances since

leaving TANF, whether new testing is necessary. However, the eJAS documentation must be completed each time a parent is referred to CE, but may include information from a previous CE, when appropriate.

What are the elements of the Comprehensive Evaluation?

- **DSHS Foundation:**

Conducted by the WFPS, the foundation gathers family information and circumstances that can impact the parent's participation and contributes to the development of an employment plan. The foundation evaluation also identifies parents who are directed to LEP services, child only cases, those who are exempt from WorkFirst participation, and minor parents. Other elements of the Foundation section include:

- **Returners evaluation:** As part of the foundation portion of the CE, the WFPS asks specific questions and gathers relevant information from returners to TANF (those who are reapplying for TANF within six months of having exited.) The information is used in developing an employment plan that best meets the needs of a returner based on previous participation and circumstances that led to the parent returning.
- **Social services assessment:** The small number of parents who have immediate and urgent needs at the time of the foundation portion of the CE are directed to the Social Worker straightway for services. In addition, pregnant parents and others who have issues that need to be addressed are directed for a social services assessment as part of the CE. These parents are directed to complete the other portions of the CE as soon as possible. See "[Criteria for Decision Making](#)" when making immediate referrals to a Social Worker by the WFPS.

- **College Evaluation:**

Conducted by community and/or technical college staff, or designee, this section of the CE examines a parent's educational background and interests, and uses the CASAS appraisal of basic skill levels to contribute to the employment plan. College staff explores training needs and options with the parents. See "[Criteria for Decision Making](#)"– Education and Training Criteria when completing the Education and Training element of the comprehensive evaluation.

- **ESD Employment Plan - Evaluation and Recommendation:**

The Employment Specialist conducts the Work Skill Assessment and develops an Employment plan with the parent which is recorded in CATS and used to complete the portions of the ESD Recommendation Section of the comprehensive evaluation.

- **Work Skill Assessment:** Conducted by an Employment Security Department Employment Specialist, the Work Skill Assessment examines

work skills, work interests and work values, and ties these elements to local labor market information to define career options and opportunities with local employers. The Employment Specialist records the results on the Employment Plan in CATS.

- **Recommendation:** Based on information gathered from the foundation, social services assessment (when appropriate), education and ESD evaluation elements of the CE, ESD staff, along with the parent, makes recommendations for employment pathway activities. See [Criteria for Decision Making](#) when building an Employment Plan and making recommendation for employment pathway activities.
- **DSHS Final Decision/IRP Development:**

Together with the parent, the WFPS reviews and considers ESD's recommendation(s), special records and other relevant information and develops the IRP.

Where are the results of the Comprehensive Evaluation documented?

The final results from each WorkFirst partner's portion of the CE is recorded in the comprehensive evaluation screens in eJAS. The information is accessible and readable by all the WorkFirst partners and will be used to make decisions regarding program participation and expectations. The local WorkFirst partners conducting the CE elements are responsible to document the information immediately upon completion of the evaluation sections.

How will the results of the Comprehensive Evaluation be used to develop an Individual Responsibility Plan (IRP)?

The results and recommendations of the comprehensive evaluation will be used to develop the IRP. It will indicate the best pathway for the parent and what support services WorkFirst will provide the parent to participate. Decisions will be made objectively and consistently, based on program policy criteria - See ["Criteria for Decision Making"](#). The IRP will be developed by the WFPS and the parent to:

- Describe the parent's responsibilities, activity requirements and authorized support services.
- Keep him or her moving toward independence.
- Document the action steps the parent agreed to do. This is essential to holding the parent responsible for her or his participation.
- Describe DSHS responsibilities and which support services will be provided.
- Describe for the parent the consequences of not meeting the requirements.

IRPs will be developed for longer-term activities if parents are participating in consecutive program elements. The expectation is that all activities are preparing parents to go to work. IRPs will be developed to find the best mix of activities, including those who are participating in issue resolution activities. Parents will be expected to participate full-time.

WFPSs will use the criteria for developing an IRP and making referrals to a pathway as outlined in [“Criteria for Decision Making”](#).

Referrals to Community Jobs (CJ) activities can be made as the result of the comprehensive evaluation process based on the program criteria that determines when CJ is appropriate. Community Jobs referrals will be made only for the parents least likely to succeed in attaining unsubsidized employment. Based on the comprehensive evaluation results, CJ will be an option for those parents who have participated in other activities and have not been successful or where other activities may not be deemed appropriate.

Comprehensive Evaluation: Step-by-Step Guide

Refer to the [Application and Screening](#) section for a step by step guide of the process leading to the determination of eligibility and the comprehensive evaluation. Application information will be used as a part of the foundation element of the comprehensive evaluation as appropriate and later in terms of the overall results of the comprehensive evaluation to develop the parent's Individual Responsibility Plan (IRP).

DSHS

1. Conduct Positive Prevention strategies as part of the TANF application process.

Child care, transportation and/or other needed support services will be provided by DSHS staff at the time of positive prevention so the parent can complete the comprehensive evaluation and prepare for employment pathway participation.

2. The WFPS will:
 - a. Use the questions in the comprehensive evaluation section in eJAS to begin to establish the foundation. The evaluation covers the following areas for each parent.
 - Transportation
 - Housing
 - Literacy and Learning
 - [Financial Literacy](#)
 - Pregnancy and Parenting
 - Family Planning
 - Child General Health/Children and Special Needs
 - Child Care
 - Child Welfare
 - Other Agency/Tribal
 - Adult General Health
 - Adult Dependent Care
 - Legal
 - Employment
 - Customer Concerns
 - Returners
 - Family Violence Screening/Evaluation

- Mental Health
 - Chemical Dependency Screening/Evaluation
 - b. Determine who are returners and conduct the returner portion of the comprehensive evaluation.
 - c. Open the **CE** code, when:
 - The foundation is pending, but the parent is in the CE process, which includes Social Worker assessment.
 - The parent has finished the comprehensive evaluation Foundation.
 - d. Refer some parent(s), as appropriate, directly to the LEP Pathway provider (See [LEP Pathway](#) section) or to the Teen Parent pathway ([Dependent teens and pregnant and parenting minors](#) section). The WFPS will do an IRP and enter the appropriate component code into eJAS.
 - e. Refer parents found to have immediate urgent issues to a Social Worker for an assessment. See [“Criteria for Decision Making”](#) when making immediate referrals to a Social Worker by the WFPS. The WFPS will:
 - Do an IRP.
 - Pend the comprehensive evaluation.
 - Keep the **CE** component code in eJAS.
- 3. As needed, the DSHS Social Worker:
 - Conducts the social services assessment portion of the comprehensive evaluation and
 - Documents the results and activities options.
 - Determines whether parents are able to complete the remainder of the comprehensive evaluation.
- 4. The WFPS will:
 - a. Refer all other parents to complete the remainder of the comprehensive evaluation using the CE component code. Parents will be given an IRP detailing their requirements while undergoing the comprehensive evaluation. The IRP will also include who to contact if unable to attend evaluations and the date to report back with the results of the evaluations.
 - b. Pursue sanction if the parent refuses to meet IRP requirements, complete the comprehensive evaluation or report back as directed.
- 5. If the parent is unable to continue, the WFPS:
 - a. Stops the comprehensive evaluation process;
 - b. Documents the reason the parent cannot complete the comprehensive evaluation;
 - c. Documents the specific reason in the appropriate eJAS case note(s) category;
 - d. Goes to the DSHS final decision section:
 - Enters “Start Date”.
 - Clicks on “Client could not finish Evaluation (select reason below)”.

- From the drop-down box chooses the appropriate reason.
- Enters notes in “Decision & Justification” section
- Clicks on “Save/Finish Final Decision” button.

Note: The CE component code will close automatically when the final decision is made.

- Enters the appropriate component code.
- Updates the IRP.

Community and Technical College

A Community and Technical College representative will:

1. Make an evaluation of the following educational areas:
 - CASAS Appraisal
 - Literacy/Educational Level
 - Current enrollment or interest in attending school.
2. Conduct a one-on-one interview and inform the parent of training options and provide personal information related to the parent's education/literacy levels.
3. Document the results of the evaluation on the comprehensive evaluation in eJAS. Documentation will include a recommendation for services using the criteria for [“Criteria for Decision Making”](#) – Education and Training Criteria.
4. Upon completion of the Educational Assessment, based on local procedures, the college representative will advise the parent where to report to continue the comprehensive evaluation or to report back to ESD for an overall interpretation/recommendation for services based on the final results of their evaluation.
5. If the parent is unable to continue:
 - a. Stop the evaluation process.
 - b. Document the inability on the comprehensive evaluation.
 - c. Document the specific reason in the appropriate eJAS case notes category.
 - d. Refer the parent back to the WFPS.

Employment Security Department

1. An Employment Security Department Employment Counselor will conduct a Work Skill Assessment for each parent referred for the evaluation. Parents will be evaluated using appropriate assessment tools necessary to evaluate and/or make recommendations for the following areas:
 - Work History
 - Work Needs
 - Work Values
 - Work Interests
 - Work Skill

- Local Labor Market Information
 - Long and Short Term Goals
 - Recommendation for Services
2. Upon completion of the evaluation a one-on-one meeting between each parent and an ESD employment specialist is required. This meeting will be used to discuss the interpretation of the entire comprehensive evaluation and build an employment plan. This includes objective application of the criteria to determine who will be referred to basic education, Community Jobs and the other approved WorkFirst activities. A recommendation for an employment pathway cannot be made without the parent present to participate in the recommendation process. Staff will consult with partner agency staff as needed to complete a parent's employment plan.
 3. Staff will use the results of the Work Skill Assessment to complete the Employment Plan. When the Employment Plan is completed and approved in the Customer Automated Tracking System (CATS), ESD staff will complete their final recommendation for services on the comprehensive evaluation in eJAS.
 - ESD Staff will take into consideration all elements of the comprehensive evaluation, including parent input, when making their recommendation for the best employment activities pathway. Services recommended will be made objectively and consistently, based on program policy criteria. See [“Criteria for Decision Making”](#) when building an Employment Plan and making recommendation for employment pathway activities.
 - Upon completion and documentation of the Employment Plan in eJAS the employment counselor will advise the parent to report back to their WFPS as instructed on their IRP.
 4. If the parent is unable to continue:
 - a. Stop the evaluation process.
 - b. Document the inability on the comprehensive evaluation.
 - c. Document the specific reason in the appropriate eJAS case notes category.
 - d. Refer the parent back to the WFPS.

DSHS

The WFPS and the parent will make a decision using the final recommendation for the appropriate employment pathway activities documented on the Comprehensive Evaluation Employment Plan to develop the parent's IRP. The WFPS will:

1. Use the criteria for developing an IRP and making referrals to employment pathway activities as outlined in [Criteria for Decision Making](#).
2. Document acceptance of recommendations or justification for partial acceptance or rejection of the recommendations from the Comprehensive Evaluation Employment Plan in eJAS.
3. Update the IRP outlining the required activities and level of participation the parent must achieve.
4. Close the CE component and open the appropriate referral code in eJAS.

Resources

- [WorkFirst Comprehensive Evaluation Flow Chart](#)
- [WorkFirst Comprehensive Evaluation Standards](#)
- [WorkFirst Comprehensive Evaluation Program Criteria & Parent Involvement in Decision Making](#)
- [WorkFirst Comprehensive Evaluation Partners Roles and Responsibilities](#)

3.22 Comprehensive Evaluation Foundation

What is a Comprehensive Evaluation Foundation?

The comprehensive evaluation foundation is an automated tool for WorkFirst Program Specialists (WFPSs) or WorkFirst Social Workers (WFSWs) to:

- Focus on the family's situation and any information relevant to the parent which provides context to the remainder of the evaluation.
- Address immediate needs or crisis
- Arrange Necessary Supplemental Accommodation (NSA), if needed.
- Lead to a quicker placement in an employment pathway.

The comprehensive evaluation foundation documents the following:

- Information pertaining to a person, the family and their effect for a quicker placement in an employment pathway; and,
- Support services and child care provided so the person can complete the comprehensive evaluation and any follow up activities.

The foundation consists of questions to learn more about an individual's strengths, readiness and ability to succeed in the work place. The foundation, combined with the portions completed by the college and ESD, helps us develop an appropriate Individual Responsibility Plan (IRP), containing activities that help move the person into the best employment pathway. The CE foundation also helps determine when an assessment (a more comprehensive, in-depth, and issue-specific appraisal of employability) completed by a WFSW should be done.

As we learn more about our families and document that information in the comprehensive evaluation and the on-going observation notes, we can make better informed choices about their participation and achieve the goal of self-sufficiency.

eJAS notes provide a stand alone screening for each category. This is an important feature for family violence, because this allows family violence screening to be completed when it is safe for the family member to do so.

Completion of the CE Foundation

All individuals referred for a comprehensive evaluation foundation are expected to complete process. However, if a situation arises in which the individual states he or she can not complete the comprehensive evaluation, the individual referred to the WFSW for a Social Worker Assessment. The main question that needs to be answered during the assessment is: *Can the parent finish completing the CE?*

- If the answer is “**Yes**”, refer the individual back to the WFPS to complete the CE.
- If the answer is “**No**”, close out the **CE** component code, revise the IRP and place the individual in the appropriate WorkFirst activity.

What topics does the CE foundation cover?

As shown in the chart below, CE foundation covers all the topics needed to determine where the person is placed on the employment pathway. It also includes legally required screening for specific issues.

Below you will find a list of categories reflecting the required screenings for WorkFirst families. Dependent teens do not have the requirement of a CE foundation; however, it is recommended to document the dependant teen's educational activities, or other pertinent information in the dependant teen's eJAS case in the appropriate category. Necessary Supplemental Accommodations (NSA) status and limited English proficiency screening occurs in ACES.

CE Foundation Screening Categories	
Required Screening	<ul style="list-style-type: none">• Transportation• Housing• Literacy and Learning• <u>Financial Literacy</u>• Pregnancy and Parenting• Family Planning• Children General Health/ Children with Special Needs• Child Care• Child Welfare• Other Agency/Tribal• Adult General Health• Adult Dependent Care• Legal• Employment• Customer Concerns• Family Violence*• Mental health*• Chemical Dependency*• Returner (this category will only display for those cases

	identified as returners)
*This is special record screen and highly protected.	

Financial literacy evaluation: For a variety of reasons many parents may lack the basic financial knowledge necessary to spend their money wisely, save for the future and manage money challenges. Financial literacy can provide families with tools to smoothen transition from benefit-based to a wage-based income, and keep them from unknowingly entering into financially devastating credit arrangements. It is an essential element in parents' achieving financial stability, self-sufficiency and long-term financial well-being.

During the evaluation determine if the financial literacy activity is beneficial to the parent, and, regardless of the results, ask if the parent wants a referral to money management training available in the local community. (This is not a mandatory activity and does not have an eJAS code). Document the assessment outcome in the documentation field.

How to do the CE foundation interview?

First, set a positive tone about getting to job search and work. View individuals as unemployed or underemployed, and ask: "How can I help you get to work?" Explain to the person why we ask screening questions to:

- Help the parent succeed in the workplace;
- Provide necessary support services;
- Resolve issues without delay;
- Bundle services, so the parent can make faster progress and preserve/bank months of TANF, and
- Ensure the parent not only finds, but also keeps, a job.

Second, start acquainting the person with workplace expectations, such as the need to show up on time, every day, and how to have reliable back up plans for child care and transportation.

Last, some of the questions in the CE foundation touch on sensitive topics (like family planning). Set some expectations with the person to make the conversation go easier. Tell the person that your interview will:

- Identify areas in which he or she may need additional help, supplemental accommodations or services that will help him or her be successful in WorkFirst,
- Not require a lot of details.
- Result in a referral to experts immediately if there is a serious crisis.
- Result in other referrals once the comprehensive evaluation is completed.

Special Records Category

All individual information is confidential under state and federal law. In eJAS, there are also four categories of client information, called "Special Records", with increased protection. These categories contain information about:

- Mental Health
- Family Violence
- Chemical Dependency, and
- HIV/AIDS and STD* (Optional category)

* Please note that DSHS staff is not required to screen for HIV/AIDS/STD. This is an optional category to be used when a parent voluntarily provides information about HIV/AIDS/STD issues that could interfere with WorkFirst work activities.

It is important to document these four topics only in the matching note type in eJAS. Invite the person to discuss the matter(s) directly with her or his service provider (such as her or his job service specialist).

CE Foundation – Step-by-step guide

1. At application the WFPS documents whether the person will need supplemental accommodation (NSA) to complete the application process and actively participate. (See [Up-front referrals](#).)
2. Upon application approval, the WFPS completes the CE foundation by asking all screening questions to:
 - a. Screen for domestic/family violence emergencies.
 - b. Determine age of household members to find participation exemptions/exceptions (infants, older relatives, dependent teen or minor parent) and refer appropriately. (See Required Participation section.)
 - c. Screen for employability and make a family planning referral, if appropriate. Determine what is needed to get to the person to complete comprehensive evaluation:
 - i. Child care, transportation or other support service
 - ii. Protective payee assignment due to mismanagement of child care funds (as needed to secure child care for a parent with WCCC ineligibility due to unpaid co-payments.
 - iii. A referral to LEP, tribal, pregnancy to employment pathways to access specialized job search services. (See [Pathways](#) in the resource section below.)
 - iv. A referral to a WFSW for assessment and services, to stabilize the person's situation before the comprehensive evaluation can be completed (such as emergent, crisis or serious [domestic violence](#) or [substance abuse](#) issues). (See Resolving Issues section.)
3. See the Comprehensive Evaluation section for instructions on completing the comprehensive evaluation process.

Resources

Related WorkFirst Handbook Chapters/Attachments

- [3.1 Tools – Overview](#)
- [1.3 Up-front Referrals](#)
- [1.2 Required Participation](#)
- [6.1 Resolving Issues](#)
- [8.2 Self-employment](#)
- [4.2 Job Search Referrals](#)

Other Resources

- [Social Services Manual](#)
- [Consent to Exchange Information for Services Coordination](#)